

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MEMO ENDORSED

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CERVECERÍA MODELO DE MÉXICO,
S. DE R.L. DE C.V.,

Plaintiff,

v.

CB BRAND STRATEGIES, LLC,
CROWN IMPORTS LLC, and
COMPAÑÍA CERVECERA DE
COAHUILA, S. DE R.L. DE C.V.,

Defendants.
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No. 21-CV-01317-LAK

**USDC SDNY
DOCUMENT
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DATE FILED: 2/3/2022**

**NOTICE OF MODELO'S MOTION TO COMPEL PRODUCTION OF
DEFENDANTS' COMMUNICATIONS WITH THE
DEPARTMENT OF JUSTICE AND OTHER RELEVANT AGENCIES**

PLEASE TAKE NOTICE that, at a date and time to be determined by the Court, before the Honorable Lewis A. Kaplan of the United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, Plaintiff Cervecería Modelo de México, S. de R.L. de C.V. ("Modelo") will and hereby does move, pursuant to Rule 37(a) of the Federal Rules of Civil Procedure, for an order compelling Defendants to produce documents in response to Request No. 14 of Modelo's First Set of Requests for the Production of Documents. The bases for this Motion are set forth in the concurrently filed and attached Memorandum of Law with accompanying exhibits, the complete files and records in this action (including Modelo's First Amended Complaint (ECF No. 48)), and any such additional materials and arguments as may be considered by the Court.

Modelo certifies that Rule 37(a)(1) has been satisfied and the issues are ripe: The parties conducted meet-and-confer calls on November 9, 2021 and January 20, 2022, and exchanged letters regarding unresolved objections on December 1, 11, and 23, 2021 and January

19 and 26, 2022. The relevant document requests and objections are attached as Exhibits A and D, respectively.

Dated: New York, New York
January 31, 2022

Respectfully submitted,



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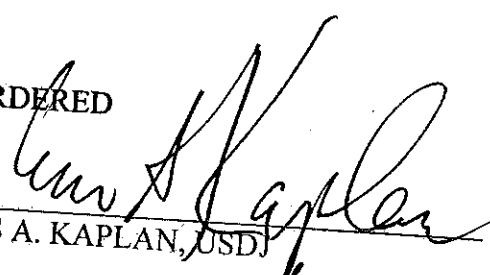
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*Counsel for Plaintiff Cerveceria
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*Motion denied without prejudice
to renewal if this discovery
dispute is not fully resolved
on or before Feb 11, 2022*

SO ORDERED



LEWIS A. KAPLAN, USDJ

2/3/22